

1 [Counsel Listed on Signature Page]  
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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 IN RE: UBER TECHNOLOGIES, INC.,  
11 PASSENGER SEXUAL ASSAULT  
12 LITIGATION

13 This Document Relates to:

14 **ALL ACTIONS**

15 Case No. 3:23-md-03084-CRB  
16 **JOINT STIPULATION REGARDING**  
17 **PRODUCTION OF MATERIAL**  
18 **RESPONSIVE TO TAR PROCESS**

19 Judge: Hon. Lisa J. Cisneros  
20 Courtroom: G – 15th Floor

## **JOINT STIPULATION**

Pursuant to Dkt. No. 2443, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”) (jointly, “the parties”), respectfully submit this Joint Stipulation regarding production of new material responsive to TAR process.

## I. Production of Documents after TAR Process

With respect to the documents which the Parties now agree are responsive after the Court's order at Dkt. No. 2443,

1. Defendants will substantially complete production of all documents deemed responsive as a result of agreements made by the Parties during the TAR negotiations<sup>1</sup> (to the extent these documents have not already been produced pursuant to Dkt. 2009-1) as well as documents deemed responsive by the Court's order at Dkt. No. 2443, to the extent Defendants do not assert privilege over those documents or otherwise assert those documents are protected from disclosure, by April 11, 2024.
2. These documents will be produced to Plaintiffs pursuant to Dkt. No. 524, and all subsequent orders and/or stipulations agreed to by the Parties related to the production of ESI.

<sup>1</sup> These documents include but are not limited to documents related to safety initiatives undertaken outside of the US as agreed to by the Parties on November 26, 2024, and documents regarding sexual assaults of drivers by passengers.

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## ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: March 20, 2025

By: /s/ Roopal P. Luhana

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Roopal P. Luhana